

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

JEROME K. HAMILTON, a/k/a
ELOHIM CHEIKH AHMED,

Plaintiff,

v.

CATHY L. GUESSFORD, REBECCA
MCBRIDE, ROBERT F. SNYDER, THOMAS
L. CARROLL, and STANLEY W. TAYLOR,
JR.

Defendants

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C.A. No. 04-1422 (GMS)

JURY TRIAL DEMANDED

PLAINTIFF'S SECOND SET OF INTERROGATORIES
DIRECTED TO ALL DEFENDANTS

Throughout these interrogatories, whenever you are requested to "identify" a communication of any type, and such communication was oral, the following should be furnished:

- (a) By whom it was made and to whom it was directed;
- (b) Its specific subject;
- (c) The date upon which it was made;
- (d) Who else was present when it was made;
- (e) Whether it was recorded, described, or summarized in any writing of any type, if so, identify each such writing in the manner indicated below.

Whenever you are requested to "identify" a communication, memorandum, or record of any type, and such communication was written, the following information should be furnished (in place of identification, production is acceptable):

- (a) Its nature, e.g., letter, memorandum, telegram, note, drawing, etc.,;
- (b) Its specific subject;
- (c) By whom it was made and to whom it was directed;
- (d) The date upon which it was made;
- (e) Who has possession of the original and any copies.

Whenever a person is to be "identified", you should furnish, except as otherwise noted:

- (a) Name and present or last known address, and
- (b) If a corporation, the state of incorporation.

1. State the names, last known addresses, and telephone numbers of all persons who have direct knowledge of or were eyewitnesses to facts alleged in the complaint.

ANSWER:

2. Give the names, last known addresses, and telephone numbers of all persons other than those listed in the answers to Interrogatory No. 2 who have knowledge of the facts concerning how the events described in the complaint occurred.

ANSWER:

3. Give the names, last known addresses, and telephone numbers of all other persons who have knowledge of any facts alleged in the pleadings other than those persons given in the answers to Interrogatories 1 and 2.

ANSWER:

4. Identify any report, memorandum, or resume prepared by you or anyone acting on your behalf but not necessarily limited to any investigation, or other person pertaining to any of the facts alleged or referred to in the pleadings, give the date of each such matter in writing, whether or not the writing was prepared by you, or is a writing of which you have only knowledge, or your attorney has knowledge.

ANSWER:

5. State the name and present or last known address of each person who you expect to call as an expert witness at the trial and, as to each person named, state the subject matter on which the witness is expected to testify, the substance of the matters to which the witness is expected to testify, the substance of the opinions to which the witness is expected to testify, and a summary of the grounds for each witnesses' opinion, identifying the dates of any reports prepared by that witness.

ANSWER:

6. State the name and present or last known address of each person who has been consulted as an expert in anticipation of litigation or preparation for trial, whether or not that person is expected to be called as a witness by you at trial.

ANSWER:

7. Please state each date that the plaintiff's sentence was reviewed and calculated, and for each date, give the name of the person who made the review, the person who made the calculation for the release date, identify by date, author, and intended recipient each and every document relied upon by the person in making the calculation, and pursuant to Rule 34, Federal Rules of Civil Procedure, please attach copies of all such documents to these answers to interrogatories.

ANSWER:

8. Identify each administrative rule, statute, and/or order used by each person referred to in Interrogatory No. 8, in calculating the plaintiff's release date, organizing the answer for each time the release date was recalculated.

ANSWER:

9. Please identify each and every grievance filed by the plaintiff during his incarceration from January 1, 1999 until his release date, and for such grievance, please identify each person who reviewed the grievance, the date the grievance was received, and identify by date, author, and intended recipient each and every document relating to, pertaining to, or mentioning such grievance, including, but not limited to the resolution of the grievance, and, pursuant to the provisions of Rule 34, Federal Rules of Civil Procedure, please attach copies of all such documents to these answers to interrogatories.

ANSWER:

10. With regards to each defendant, please state the dates which each defendant had reason to calculate or recalculate the plaintiff's release date, and the date of such calculation, and, for each such calculation or recalculation, identify by date, author, and intended recipient each and every document which relates to, pertains to, or mention such calculation or recalculation, and pursuant to Rule 34, Federal Rules of Civil Procedure, please attach copies of all such documents to these answers to interrogatories.

ANSWER:

11. For each time that the plaintiff's release date was recalculated, please identify, for each individual defendant, the date each such individual defendant reviewed, approved, and/or ratified the recalculated release date, identifying by date, author, and intended recipient each and every document utilized, referred to, or examined in the review, approval, and or ratification of the recalculation of the plaintiff's sentence, and pursuant to Rule 34, Federal Rules of Civil Procedure, please attach copies of all such documents to these answers to interrogatories.

ANSWER:

12. For each individual defendant, list by date and inmate, each incident in which it was discovered, by any of the defendants, that there had been a previous error in the calculation of any part of the sentence of any inmate in the care custody or control of the State of Delaware from 1970 up until the present, and for each such incident, identify the inmate, and the date, author, and intended recipient of each and every document which relates to, pertains, or mentions such error, and pursuant to Rule 34, Federal Rules of Civil Procedure, please attach copies of all such documents to these answers to interrogatories.

ANSWER:

ABER, GOLDLUST, BAKER & OVER

/s/ Gary W. Aber

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DATED: June 7, 2006

